



the campaign for
environmentally responsible
health care

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Dr. Michael B. Shelby, Director
Center for Evaluation of Risks to Human Reproduction
NIEHS
P.O. Box 12233, MD EG-32
Research Triangle Park, NC 27709

June 28, 2006

Re: NTP Brief on the Potential Human Reproductive and Developmental Effects of
Di(2-ethylhexyl) Phthalate (DEHP)

Dear Dr. Shelby:

On behalf of Health Care Without Harm (HCWH), we submit these comments on the NTP Brief on the Potential Human Reproductive and Developmental Effects of Di(2-ethylhexyl) Phthalate (DEHP) issued May 2006.

Health Care Without Harm concurs that:

- It is reasonable and prudent to conclude that the results reported in laboratory animals indicate a potential for similar or other adverse effects in human populations;
- The scientific evidence [is] sufficient to conclude that DEHP may adversely affect human reproduction or development if exposures are sufficiently high;
- Levels of DEHP exposure in sick infants receiving medical care are of serious concern;
- Health care delivery can be a significant source of DEHP exposure; and
- Because DEHP crosses the placenta, exposures in pregnant women receiving medical treatments are also of concern.

We continue to have significant concern about ambient DEHP exposures in pregnant and lactating women. The 2000 Expert Panel concluded that "... ambient oral DEHP exposures to pregnant or lactating women may adversely affect the development of their offspring." The NTP draft brief raises concern only for high DEHP exposures: "[h]igh DEHP exposures of fetuses and infants can occur when pregnant and breast-feeding women undergo certain medical procedures involving DEHP-containing polyvinyl chloride medical devices," but has only "some concern" about exposures to DEHP in pregnant and lactating women not medically exposed. The 2005 Expert Panel explained that they reduced their level of concern in pregnant and lactating women to "some concern" because of more precise exposure estimates. However, this is one area within the expert panel where there was clearly not consensus, as indicated in the introduction to their

final report. HCWH believes that ambient exposures in pregnant women remain a significant public health concern because:

- 1) MEHP passes the placenta in free form where it may not be detoxified by the fetus;
- 2) exposure throughout pregnancy is not necessary to cause damage in animal models;
- 3) current exposure estimates in women of child bearing age do not distinguish peak or episodic exposures from average exposures; and
- 4) pregnant and lactating women are also exposed in the ambient environment to other phthalates (e.g. DBP, BBP) with mechanisms of toxicity similar to DEHP. Exposures to these phthalates should be considered in the aggregate and not individually when drawing conclusions that will influence public health policy.

Thank you for considering our comments. We look forward to seeing the NTP brief on DEHP finalized and request that you add us to any listserve that is notified of the final brief from NTP.

Sincerely,

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